

UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND  
Southern Division

UNITED STATES OF AMERICA,  
Plaintiff,

**V.**

**\$4,272.86 in U.S. Currency (Jordan),  
Defendant.**

[illegible]

Civil No. \_\_\_\_\_

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**VERIFIED COMPLAINT FOR FORFEITURE**

Plaintiff, United States of America, through undersigned counsel, brings this complaint and alleges as follows in accordance with Supplemental Rule G(2) of the Federal Rules of Civil Procedure:

## NATURE OF THE ACTION

1. This is a civil forfeiture action against U.S. currency that is money that was furnished or intended to be furnished by a person in exchange for a controlled substance in violation of 21 U.S.C. section 841, and is, therefore, forfeitable pursuant to 21 U.S.C. section 881(a)(6).

## THE DEFENDANT IN REM

2. The defendant is \$4,272.86 seized by the Maryland State Police from two Citibank accounts in the name of Terre Jordan between March 1 and April 10, 2013, (hereinafter, the “Defendant Currency”).

3. The seizure of the Defendant Currency subsequently was adopted by the United States Drug Enforcement Administration (DEA). The Defendant Currency is presently in the custody of DEA in Maryland.

**JURISDICTION AND VENUE**

4. Plaintiff brings this action *in rem* in its own right to forfeit and condemn the Defendant Currency. This Court has jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345, over an action for forfeiture under 28 U.S.C. § 1355(a), and over this particular action under 21 U.S.C. section 881.

5. This Court has *in rem* jurisdiction over the Defendant Currency under 28 U.S.C. § 1355(b).

6. Venue is proper in this district pursuant to 28 U.S.C. § 1355(b)(1), because the acts or omissions giving rise to the forfeiture occurred in this district and pursuant to 28 U.S.C. § 1395 because the property is located in this district.

**BASIS FOR FORFEITURE**

7. The Defendant Currency is subject to forfeiture pursuant to 21 U.S.C. section 881(a)(6) because it is money that was furnished or intended to be furnished by a person in exchange for a controlled substance in violation of 21 U.S.C. section 841.

**FACTS**

8. The forfeiture is based upon, but not limited to, the evidence outlined in the attached Declaration of Trooper First Class Patrick Lane, Maryland State Police, which is incorporated herein by reference.

**WHEREFORE**, plaintiff, the United States of America, prays that all persons who reasonably appear to be potential claimants with interests in the Defendant Currency be cited to appear herein and answer the Complaint; that the Defendant Currency be forfeited and condemned to the United States of America; that upon Final Decree of Forfeiture, the U.S.

Marshals Service dispose of the Defendant Currency according to law; and that the plaintiff have such other and further relief as this Court deems proper and just.

Dated: June 11, 2013.

Respectfully submitted,

Rod J. Rosenstein  
UNITED STATES ATTORNEY  
District of Maryland



Richard C. Kay  
Assistant U.S. Attorney  
36 South Charles Street  
Fourth Floor  
Baltimore, MD 21201  
410 209-4800

**VERIFICATION**

I, Richard C. Kay, declare under penalty of perjury as provided by 28 U.S.C. § 1746, that the foregoing Complaint for Forfeiture *in rem* is based on reports and information furnished to me by the Drug Enforcement Administration and the Maryland State Police, and that everything contained therein is true and correct to the best of my knowledge and belief.



Richard C. Kay, Esq.  
Assistant U.S. Attorney  
United States Attorney's Office  
District of Maryland

Declaration

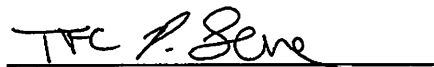
This affidavit is submitted in support of a Complaint For Forfeiture of \$4,272.86 in U.S. currency.

I, Trooper First Class Patrick Lane, of the Maryland State Police Asset Forfeiture Unit, submit that there are sufficient facts to support a reasonable belief that the \$4,272.86 in U.S. currency constitutes (1) money, negotiable instruments, securities and other things of value furnished and intended to be furnished in exchange for a controlled substance in violation of the controlled substances act; (2) proceeds traceable to such an exchange; and (3) money, negotiable instruments, and securities used and intended to be used to facilitate a violation of the Controlled Substances Act in violation of 21 U.S.C. § 841 and thus is subject to forfeiture pursuant to 21 U.S.C. § 881(a)(6).

- a. On February 28, 2013, Detective Julia Heng of the University of Maryland Police and members of the Maryland State Police - Metropolitan Area Drug Task Force obtained a search warrant, entered and searched Rooms 603 and 709, 156 Waterfront St, National Harbor, Prince George's County MD, the Aloft hotel (referred to herein as The Residence). Earlier on February 28, 2013, investigators found 10 pounds of marijuana in the possession of Terre Jordan and Loretta Lock, leading to executing the search warrant in their hotel rooms.
- b. After searching the Residence, the following items were recovered from room 603, \$33,700.00 that was located in a Samsonite luggage case. Inside the case was found two bank cards in the name of Terre Jordan. Also in the Samsonite case was a plastic bag containing 14 grams of marijuana.
- c. I ran a criminal history check on both subjects. Jordan has two previous CDS possession arrests and four previous non-CDS arrests. Jordan was most recently arrested on March 23, 2012 for CDS possession. I was unable to locate any previous CDS arrests for Lock, however Lock does have 8 previous non CDS arrests. Lock was most recently arrested on November 14, 2006 for receiving stolen property.

- d. I was unable to locate any documented wages for Jordan or Lock after running a check through the Maryland Department of Labor, Licensing and Regulation.
- e. Det. Heng provided me with bank account information located on Jordan as a result of his arrest. I applied for and received three warrants to search Wells Fargo, Bank of America and Citibank for accounts belonging to Terre Jordan or Loretta Lock on March 1, 2013. The warrants were signed by Judge Hantman of the Howard County District Court.
- f. On April 10, 2013 I received the checks from Citibank. Official Check #112549683 for \$1,200.41 and #112549684 for \$3,072.32. Both accounts are in Terre Jordan's name, who has no recent documented wages. Account #42002147009 contained \$1,200.41 and Account #42002146993 contained \$3,072.32.

I DECLARE UNDER PENALTY OF PERJURY PURSUANT TO TITLE 28 U.S.C. 1746 THAT THE FACTS SUBMITTED BY THE MARYLAND STATE POLICE, IN REFERENCE TO THE SEIZURE OF \$4,272.86.00 IN U.S. CURRENCY FROM TERRE EMOND JORDAN ARE ACCURATE, TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.



Patrick Lane  
Trooper First Class  
Maryland State Police

**MEMORANDUM**

DATE: June 11, 2013

TO: Kristine Cupp  
U.S. Marshal Service

FROM: Theresa Tepe  
Paralegal Specialist  
U.S. Attorney's Office - District of Maryland

RE: **U.S. v. \$4,272.86 U.S. CURRENCY**

**Civil Action No.**

**CATS ID**  
**Agency Case No. -**

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The United States has filed a forfeiture action against **\$4,272.86 U.S. CURRENCY**. A copy of the Complaint for Forfeiture is attached.

Notice of this seizure will be published at [www.forfeiture.gov](http://www.forfeiture.gov) pursuant to Rule G of the Supplemental Rules for Admiralty or Maritime and Asset Forfeiture Claims.

Thank you.

Attachment

**U.S. Department of Justice  
United States Marshals Service**
**PROCESS RECEIPT AND  
RETURN**

PLAINTIFF <b>UNITED STATES OF AMERICA</b>	COURT CASE NUMBER
DEFENDANT <b>\$4,272.86 U.S. Currency</b>	TYPE OF PROCESS Verified Complaint in Rem

<b>SERVE</b> ↓ <b>AT</b>	NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC. TO SERVE OR DESCRIPTION OF PROPERTY TO SEIZE OR CONDEMN
	ADDRESS (Street or RFD, Apartment No., City, State, and ZIP Code)

SEND NOTICE OF SERVICE TO REQUESTER AT NAME AND ADDRESS BELOW:	Number of process to be served with this Form - 285	
Theresa Tepe, FSA Paralegal Specialist U.S. Attorney's Office 36 S. Charles Street, 4th floor Baltimore, Maryland 21201	Number of parties to be served in this case	
	Check for service on U.S.A.	

SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN EXPEDITING SERVICE (Include Business and Alternate Address, All Telephone Numbers, and Estimated Times Available For Service)

Arrest property. Fill in the date of arrest in this process receipt and return our copy.

Signature of Attorney or other Originator requesting service on behalf of: 	TELEPHONE NUMBER <b>410.209.4800</b>	DATE 6/11/13
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**SPACE BELOW FOR USE OF U.S. MARSHAL ONLY - DO NOT WRITE BELOW THIS LINE**

I acknowledge receipt for the total number of process indicated. (Sign only first USM 285 if more than one USM 285 is submitted)	Total Process No. _____	District of Origin No. _____	District to Serve No. _____	Signature of Authorized USMS Deputy or Clerk _____	Date _____
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I hereby certify and return that I ☐ have personally served, ☐ have legal evidence of service, ☐ have executed as shown in "Remarks", the process described on the individual, company, corporation, etc. at the address shown above or on the individual, company, corporation, etc., shown at the address inserted below.

☐ I hereby certify and return that I am unable to locate the individual, company, corporation, etc., named above (See remarks below).

Name and title of individual served (If not shown above).	<input type="checkbox"/> A person of suitable age and discretion then residing in the defendant's usual place of abode.					
Address (complete only if different than shown above)	Date of Service	Time am pm				
	Signature of U.S. Marshal or Deputy					
Service Fee	Total Mileage Charges (including endeavors)	Forwarding Fee	Total Charges	Advance Deposits	Amount Owed to US Marshal or	Amount or Refund

REMARKS: